

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA (Johnstown)**

IN RE: LARRY D SHAFFER CAROL S. SHAFFER Debtors	Case No. 20-70128-JAD
FREEDOM MORTGAGE CORPORATION Movant	Chapter 13 Hearing Date: 04/12/2023 Hearing Time: 10:00 am Objection Date: 04/05/2023
vs. LARRY D SHAFFER CAROL S. SHAFFER And RONDA J. WINNECOUR (TRUSTEE) Respondent	11 U.S.C. §362

**NOTICE OF ZOOM HEARING AND RESPONSE DEADLINE REGARDING  
MOTION OF FREEDOM MORTGAGE CORPORATION FOR RELIEF FROM THE  
AUTOMATIC STAY**

TO THE RESPONDENT(S):

You are hereby notified that the above Movant seeks an order affecting your rights or property.

You are further instructed to file with the Clerk and serve upon the undersigned attorney for Movant a response to the Motion by no later than **04/05/2023** (i.e., more than seventeen (17) days after the date of service below), in accordance with the Federal Rules Of Bankruptcy Procedure, the Local Rules of this Court, and the general procedures of the Presiding Judge as found on the Court's web page at [www.pawb.uscourts.gov](http://www.pawb.uscourts.gov). If you fail to timely file and serve a written response, an order granting the relief requested in the Motion may be entered and the hearing may not be held. Please refer to the Judge's calendar posted on the Court's web site at [www.pawb.uscourts.gov](http://www.pawb.uscourts.gov) to verify if a default order was signed or if the hearing will go forward as scheduled.

You should take this Notice and the Motion to a lawyer at once.

A Zoom Video Conference Hearing will be held on **04/12/2023**, at **10:00 am** before Judge Jeffery A. Deller via the Zoom Video Conference Application ("Zoom"). To participate in and join a Zoom Hearing, please initiate and use the following link at least ten (10) minutes prior to the scheduled Zoom Hearing time: <https://www.zoomgov.com/j/16009283473>, or alternatively, you may use the

following Meeting ID: 160 0928 3473. All participants are required to appear by Zoom and must comply with the *Notice of Temporary Modification of Procedures Before the Honorable Jeffery A. Deller For Matters Scheduled On or After January 1, 2021* (“Judge Deller’s Zoom Procedures”), which can be found on the Court’s website at <http://www.pawb.uscourts.gov/content/judge-jeffery-deller>. Persons without video conferencing capabilities must immediately contact Chambers staff at (412) 644-4710 to make alternative arrangements. Absent emergency circumstances, such arrangements must be made no later than three (3) business days prior to the hearing.

All persons are reminded that pursuant to the Court’s Notice and Order, and as set forth in Judge Deller’s Zoom Procedures, the public’s recording or duplication of any audio or video of the hearing is strictly prohibited.

Only a limited time of 10 minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled by the Court for a later date.

Date of Service: **March 13, 2023**

/s/Mario Hanyon  
Andrew Spivack, PA Bar No. 84439  
Matt Fissel, PA Bar No. 314567  
Mario Hanyon, PA Bar No. 203993  
Ryan Starks, PA Bar No. 330002  
Jay Jones, PA Bar No. 86657  
Attorney for Creditor  
BROCK & SCOTT, PLLC  
8757 Red Oak Boulevard, Suite 150  
Charlotte, NC 28217  
Telephone: (844) 856-6646  
Facsimile: (704) 369-0760  
E-Mail: PABKR@brockandscott.com

**IMPORTANT NOTICE**

Freedom Mortgage Corporation (“Freedom”) is firmly committed to helping its borrowers who are experiencing a hardship. Depending on the circumstances of your case, Freedom may be amenable to consensual resolution of this matter, with Court approval. Potential options for resolution may include, among other things, temporary forbearance of payments, payment restructuring and/or adjustment of your payment amount.

If you (or, if applicable, any co-debtors) have experienced a hardship, please contact us (or have your counsel contact us, if you are represented) promptly to discuss possible options.